

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

SUPPLY CHAIN CONNECT, LLC,

Plaintiff,

v.

AFTON CHEMICAL CORPORATION,  
et al.

Defendants.

CIVIL ACTION NO.  
4:11-cv-02191

JURY TRIAL DEMANDED

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND**

Defendant Quadrem International Holdings Limited (“Quadrem International Holdings”) moves for a 30-day extension of time for Quadrem International Holdings to answer or otherwise respond to Plaintiff Supply Chain Connect LLC’s Complaint up to and including September 16, 2011. Plaintiff’s Complaint was delivered by certified mail to Quadrem International Holdings’ registered agent on June 27, 2011 and a first 30-day extension of time to answer was granted until August 17, 2011. Quadrem International Holdings does not waive any defenses or matters that may be presented pursuant to Federal Rule of Civil Procedure 12(b) or any other rule or law.

August 11, 2011

/s/ Todd Y. Brandt  
(lead attorney)  
Texas State Bar No. 24027051  
S.D.TX # 27048  
Stevens Love  
5020 Montrose Blvd.  
Houston, Texas 77006  
(713) 284 5201  
todd@stevenslove.com

Scott E. Stevens  
Texas State Bar No. 00792024  
S.D.TX #433462  
Darrell G. Dotson  
Texas State Bar No. 24002010  
S.D.TX # 23686  
Stevens Love  
111 West Tyler Street  
PO Box 3427  
Longview, Texas 75606  
(903) 753-6760  
scott@stevenslove.com  
darrell@stevenslove.com

Daniel N. Lundeen  
Texas State Bar No. 12695250  
S.D.TX # 6524  
Marcee G. Lundeen  
Texas State Bar No. 12695500  
S.D.TX # 34855  
Lundeen & Lundeen, PLLC  
2710 Louisiana Street  
Houston, Texas 77006  
(713) 652-2555  
dan@LPATS.com  
Marcee@LPATS.com

*Counsel for Plaintiff Supply Chain  
Connect, LLC*

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 11, 2011, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Todd Y. Brandt  
Todd Y. Brandt